

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

JANE DOE,

Plaintiff,

vs.

BOARD OF REGENTS OF THE  
UNIVERSITY OF NEBRASKA; and  
individuals TAMIKO STRICKMAN and  
JOHN ROE, individually and in their  
official capacities; and OTHER  
UNIDENTIFIED DEFENDANTS;

Defendants.

Case No. 4:21-cv-03049

**SUPPLEMENTAL  
DECLARATION OF LILY AMARE**

I, Lily Amare, make this Declaration in lieu of an affidavit as permitted by 28 U.S.C. § 1746. I am aware that this Declaration will be filed in the United States District Court for the District of Nebraska and that it is the legal equivalent of a statement under oath.

1. I am over the age of 18 and competent in all respects to make this Declaration. The facts contained herein are based upon my personal knowledge.

2. I am an attorney at the law firm Cline Williams Wright Johnson & Oldfather, L.L.P., and counsel for Defendant Board of Regents of the University of Nebraska ("BRUN") and Defendant Tamiko Strickman ("Strickman") (collectively, "Defendants").

3. This Declaration is offered in support of Defendants' Motion for Summary Judgment and in support of their Motion to Exclude Plaintiff's Experts and Strike.

4. Attached hereto as **Exhibit W** is a true and correct copy of the complete transcript of Plaintiff's deposition.

5. Attached hereto as **Exhibit X** is a true and correct copy of the complete transcript of Andrew Verzilli's deposition.

6. Attached hereto as **Exhibit Y** is a true and correct copy of an excerpt from Strickman's deposition.

7. Attached hereto as **Exhibit Z** is a true and correct copy of Plaintiff's Answers to Interrogatories, redacted for irrelevant portions.

8. Attached hereto as **Exhibit AA** is a true and correct copy of Plaintiff's Responses to Request for Production of Documents, redacted for irrelevant portions.

9. On October 31, 2022, on behalf of the Defendants, I issued a subpoena upon University of Nebraska-Lincoln Health Center ("Health Center") and requested "the complete medical records" for the Plaintiff. The records received in response to the subpoena revealed that Plaintiff's last visit to the Health Center was on March 3, 2016.

10. Plaintiff has not designated any medical expert to testify about the alleged injuries, nor has she produced medical records which indicate her alleged symptoms were caused by the alleged post-February conduct.

11. If called as a witness to testify, I would competently testify to each fact contained in this Declaration.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

  
\_\_\_\_\_  
Lily Amare

January 2, 2024  
\_\_\_\_\_  
Date